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January 24, 2025

VIA PACER

Hon. Julien Xavier Neals, U.S.D.J.
United States District Court
District of New Jersey
MLK Jr. Federal Bldg. & U.S. Courthouse
50 Walnut Street, Courtroom MLK 5D
Newark, New Jersey 07102

RE: Eric Lunsford v. Rutgers University, et al.
Case No. 2:24-cv-04359-JXN-JRA

Dear Judge Neals:

This firm represents Defendants, Rutgers University (pled as “Rutgers University d/b/a University Correctional Healthcare”) (“Rutgers”) and Barrington Lynch, M.D. (“Dr. Lynch”) in the above-captioned matter. In accordance with the Text Order entered on October 21, 2024 (ECF 29), I write (jointly with Plaintiff’s counsel) to provide an update regarding the status of discovery.

Written discovery is complete and the deposition of Plaintiff was conducted on January 21, 2025. There are no outstanding disputes regarding discovery at this time. Plaintiff’s counsel has indicated an intention to conduct three depositions. The parties are currently working together to coordinate deposition dates in advance of the fact discovery end-date of February 26, 2025. Due to a pending medical leave for Rutgers’ likely 30(b)(6) deponent, it is possible that a short adjournment of the discovery end-date may be needed in order for the parties to complete all of the scheduled depositions. We will jointly update the Court regarding this issue if necessary.

We thank Your Honor for the Court’s consideration of this matter.

Respectfully submitted,

NORRIS McLAUGHLIN, P.A.

/s/ Margaret Raymond-Flood

Margaret Raymond-Flood, Esq.

cc: Kaitlin McCaffrey, Esq., Esq. (via PACER)

